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Production Rate	Date Sent	Date	From	To	CC	BCC	File Name	Email Subject	Privilege	Privilege Type	Privilege Log - Description
LU00864	1/6/2021	1/6/2021	Cory, David M legal Affairs <cory@berry.edu>	Hellebach, Ryan Lee (Falkin Center) <rhellebach@berry.edu>; Preno, Jerry <jpreno@berry.edu>	John Scott <scottlambs@berry.edu>; Gauger, John <jgauger@berry.edu>; Hellebach, Ryan Lee <rhllebach@berry.edu>; (Falkin Center) <falkincen@berry.edu>; Gaun, Carrie <gauncar@acdc.org>; Lamb, Scott <scottlambs@berry.edu>; Bart, Dave [School of Business Administration] <bartdave@berry.edu>; Gabebe, Cindy Lynn <cgabebel@berry.edu>	RE: External Re: HR 1 and HR 5 for Review vnt	RE: External Re: HR 1 and HR 5 for Review vnt	Privileged - Entirety	Attorney Client	Email from in-house counsel to Ryan Hellebach and Jerry Preno, containing in-house counsel's legal opinion regarding regulatory compliance	
LU00866	1/6/2021	1/6/2021	Cory, David M legal Affairs <cory@berry.edu>	Hicks, Scott <cschick@berry.edu>	Gauger, John (COO Office) <jgauger@berry.edu>; Hellebach, Ryan Lee <rhllebach@berry.edu>; (Falkin Center) <falkincen@berry.edu>; Gaun, Carrie <gauncar@acdc.org>; Lamb, Scott <scottlambs@berry.edu>; Bart, Dave [School of Business Administration] <bartdave@berry.edu>; Hurt, Robert <rhurt@berry.edu>; Tim Clinton <tclinton@berry.edu>; (Business Administration) <cbusinessad@berry.edu>	RE: HR 1 and HR 5 for Review vnt	RE: HR 1 and HR 5 for Review	Privileged - Entirety	Attorney Client	Email from in-house counsel to Scott Hicks, containing request for facts needed to render legal opinion regarding regulatory compliance	
LU00869	1/6/2021	1/6/2021	Hicks, Scott <schick@berry.edu>	Cory, David M legal Affairs <cory@berry.edu>	Gauger, John (COO Office) <jgauger@berry.edu>; Hellebach, Ryan Lee <rhllebach@berry.edu>; (Falkin Center) <falkincen@berry.edu>; Gaun, Carrie <gauncar@acdc.org>; Lamb, Scott <scottlambs@berry.edu>; Bart, Dave [School of Business Administration] <bartdave@berry.edu>; Hurt, Robert <rhurt@berry.edu>; Tim Clinton <tclinton@berry.edu>; (Business Administration) <cbusinessad@berry.edu>	Re: HR 1 and HR 5 for Review vnt	Re: HR 1 and HR 5 for Review	Privileged - Entirety	Attorney Client	Email from Scott Hicks to in-house counsel, containing facts requested by in-house counsel in order to render legal opinion regarding regulatory compliance	
LU00873	1/6/2021	1/6/2021	Lamb, Scott <scottlambs@berry.edu>	Lamb, Scott <scottlambs@berry.edu>	Hellebach, Ryan Lee (Falkin Center) <rhellebach@berry.edu>; Preno, Jerry <jpreno@berry.edu>; (CO Office) <cooffice@berry.edu>; Gauger, John <jgauger@berry.edu>; Hicks, Scott <schick@berry.edu>; Bart, Dave [School of Business Administration] <bartdave@berry.edu>; Hurt, Robert <rhurt@berry.edu>; Gabebe, Cindy Lynn <cgabebel@berry.edu>; (Business Administration) <cbusinessad@berry.edu>; (Marketing Department) <ckoningsm@berry.edu>; Conrad, Kristin Leigh <kconradsm@berry.edu>	RE: External Re: HR 1 and HR 5 for Review vnt	RE: External Re: HR 1 and HR 5 for review	Privileged - Entirety	Attorney Client	Robert Hurt, Cindy Gabebe, Bob Kennedy, Kristin Conrad, and in-house counsel, discussing in-house counsel's legal advice regarding regulatory compliance	
LU00867	1/6/2021	1/6/2021	Cory, David M legal Affairs <cory@berry.edu>	Gauger, John (CO Office) <jgauger@berry.edu>; Glenn Clary <gclary@acdc.org>; Hicks, Scott <schick@berry.edu>	Hellebach, Ryan Lee (Falkin Center) <rhellebach@berry.edu>; Preno, Jerry <jpreno@berry.edu>; Lamb, Scott <scottlambs@berry.edu>; (School of Business) <schoobus@berry.edu>; Hurt, Robert <rhurt@berry.edu>; (Helm School of Government) <shelmschool@berry.edu>; (Business Administration) <cbusinessad@berry.edu>; (Business Administration) <cbusinessad@berry.edu>	RE: External Re: HR 1 and HR 5 for Review vnt	RE: External Re: HR 1 and HR 5 for review	Privileged - Entirety	Attorney Client	Email thread consisting of 11 email from Glenn Clary to in-house counsel, John Gauger, Ryan Hellebach, Jerry Preno, Scott Lamb, and Dave Bart, containing request for legal advice regarding regulatory compliance; 2) email from Scott Hicks to Glenn Clary, in-house counsel, requesting legal advice regarding regulatory compliance; 3) email from John Gauger to Glenn Clary, in-house counsel, John Gauger, Ryan Hellebach, Jerry Preno, Scott Lamb, and Dave Bart, containing request for legal advice regarding regulatory compliance; 4) email from in-house counsel to John Gauger, Glenn Clary, and Scott Hicks, containing in-house counsel's legal advice regarding regulatory compliance and request for further facts needed to render legal advice on the same	
LU00861	1/6/2021	1/6/2021	Lamb, Scott <scottlambs@berry.edu>	Lamb, Scott <scottlambs@berry.edu>	Gauger, John (COO Office) <jgauger@berry.edu>; Glenn Clary <gclary@acdc.org>; Hicks, Scott <schick@berry.edu>; (Falkin Center) <falkincen@berry.edu>; Hellebach, Ryan Lee <rhllebach@berry.edu>; (School of Business) <schoobus@berry.edu>; Hurt, Robert <rhurt@berry.edu>; (Helm School of Government) <shelmschool@berry.edu>; (Business Administration) <cbusinessad@berry.edu>; (Business Administration) <cbusinessad@berry.edu>; (Marketing Management) <ckoningsm@berry.edu>; Ritz, Bob (Finance) <britz@berry.edu>; (Business Administration) <cbusinessad@berry.edu>; (Legal Affairs) <claffairs@berry.edu>	RE: External Re: HR 1 and HR 5 for Review vnt	RE: External Re: HR 1 and HR 5 for review	Privileged - Entirety	Attorney Client	Email from Scott Lamb to in-house counsel, containing facts requested by in-house counsel in order to render legal opinion regarding regulatory compliance	

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Production Bates Key	Production Number	Date Sent	Date Received	From	To	CC	BCC	File Name	Email Subject	Privilege	Privilege Type	Privilege Log Description
U000159	U000151	7/9/2021	7/9/2021	Corry, David M (Legal Affairs) <dcorry@berry.edu>	Lamb, Scott <scottlamb@berry.edu>	Muldown, Shon Anthony <smuldown@berry.edu>; Hopkins, Nathan Lawrence (Office of Equity and Compliance) <nhopkins@berry.edu>; Hine, Mark <mhine@berry.edu>; Jerry Freese, Jerry <jfreese@berry.edu>		Re: MEDIA REQUEST - "Wonder?" - The K, Student Affairs mnt	Re: MEDIA REQUEST - "Wonder?" - The K, Student Affairs	Privileged - Product	Attorney Client	Email from in-house counsel to Scott Lamb, containing in-house counsel's legal advice regarding response to be provided to journalists concerning alleged sexual assault.
U000162	U000160	7/9/2021	7/9/2021	Hopkins, Nathan Lawrence (Office of Equity and Compliance) <nhopkins@berry.edu>	Corry, David M (Legal Affairs) <dcorry@berry.edu>; Lamb, Scott <scottlamb@berry.edu>	Hicks, Scott <cmhicks@berry.edu>; Freese, Jerry <jfreese@berry.edu>; Hine, Mark <mhine@berry.edu>; Muldown, Shon Anthony <smuldown@berry.edu>; Nathan Lawrence (Office of Equity and Compliance) <nhopkins@berry.edu>; Kennedy, Ron (Recruitment and Retention) <rkennedy@berry.edu>; Corneal, Kristin (Legal Marketing Department) <kcorneal@berry.edu>; Gauger, John (CDO Office) <jgauger@berry.edu>		RE: MEDIA REQUEST - "Wonder?" - The K, Student Affairs mnt	RE: MEDIA REQUEST - "Wonder?" - The K, Student Affairs	Privileged - Product	Attorney Client	Email from Nathan Hopkins to in-house counsel and Scott Lamb, discussing in-house counsel's legal advice regarding response to be provided to journalists concerning alleged sexual assault.
U000166	U000167	7/14/2021	7/14/2021	Corry, David M (Legal Affairs) <dcorry@berry.edu>	Lamb, Scott <scottlamb@berry.edu>	cmuldown@berry.edu; Hine, Mark <mhine@berry.edu>; Jerry Freese, Jerry <jfreese@berry.edu>; Hitz, Rob (Finance Admin) <rhitz@berry.edu>; Kennedy, Ron (Recruitment and Retention) <rkennedy@berry.edu>; Corneal, Kristin (Legal Marketing Department) <kcorneal@berry.edu>; Gauger, John (CDO Office) <jgauger@berry.edu>		RE: Standard Grants book draft	RE: Standard Grants book draft	Privileged - Product	Attorney Client Work Product	Email from in-house counsel to Scott Lamb, containing in-house counsel's legal advice regarding forthcoming book about Jerry Powell Jr., in response to pending litigation
U000171	U000172	7/20/2021	7/20/2021	Corry, David M (Legal Affairs) <dcorry@berry.edu>	Lamb, Scott <scottlamb@berry.edu>; Muldown, Shon Anthony <smuldown@berry.edu>	McBary, Ian Michael (Legal Affairs) <imcBary@berry.edu>; Hopkins, Nathan Lawrence (Office of Equity and Compliance) <nhopkins@berry.edu>		RE: FW: Title IX Case Action mnt	RE: FW: Title IX Case Action	Privileged - Product	Attorney Client Work Product	Email from in-house counsel to Scott Lamb, and Shon Muldown, containing in-house counsel's legal advice regarding public response to pending litigation
U000173	U000173	7/20/2021	7/20/2021	Muldown, Shon Anthony <smuldown@berry.edu>; Lamb, Scott <scottlamb@berry.edu>; McBary, Ian Michael <imcBary@berry.edu>; Hopkins, Nathan Lawrence (Office of Equity and Compliance) <nhopkins@berry.edu>	Lamb, Scott <scottlamb@berry.edu>; Muldown, Shon Anthony <smuldown@berry.edu>; McBary, Ian Michael <imcBary@berry.edu>; Hopkins, Nathan Lawrence (Office of Equity and Compliance) <nhopkins@berry.edu>	cmuldown@berry.edu; Hine, Mark <mhine@berry.edu>; Jerry Freese, Jerry <jfreese@berry.edu>; Hitz, Rob (Finance Admin) <rhitz@berry.edu>; Kennedy, Ron (Recruitment and Retention) <rkennedy@berry.edu>; Corneal, Kristin (Legal Marketing Department) <kcorneal@berry.edu>; Gauger, John (CDO Office) <jgauger@berry.edu>		First Draft Multiple Plaintiff Title IX Lawsuit Response.mnt	Privileged - Product	Attorney Client Work Product	Email from in-house counsel to Scott Lamb, and Shon Muldown, containing in-house counsel's legal advice regarding public response to pending litigation	
U000174	U000175	7/20/2021	7/20/2021	Lamb, Scott <scottlamb@berry.edu>	Lamb, Scott <scottlamb@berry.edu>	Muldown, Shon Anthony <smuldown@berry.edu>; McBary, Ian Michael <imcBary@berry.edu>; Hopkins, Nathan Lawrence (Office of Equity and Compliance) <nhopkins@berry.edu>; Scott <scottlamb@berry.edu>; Corneal, David M (Legal Affairs) <dcorry@berry.edu>; Freese, Jerry <jfreese@berry.edu>		RE: SECOND Draft (post Corry and Lamb) Multiple Plaintiff Title IX Lawsuit Response.mnt	Re: SECOND Draft (post Corry and Lamb) Multiple Plaintiff Title IX Lawsuit Response	Privileged - Product	Attorney Client Work Product	Email from Scott Lamb to in-house counsel, Shon Muldown, Scott Hicks, Jerry Freese, and Nathan Hopkins, containing response to draft public statement prepared by in-house counsel in response to pending litigation
U000176	U000177	7/20/2021	7/20/2021	Lamb, Scott <scottlamb@berry.edu>	Lamb, Scott <scottlamb@berry.edu>	Muldown, Shon Anthony <smuldown@berry.edu>; McBary, Ian Michael <imcBary@berry.edu>; Hopkins, Nathan Lawrence (Office of Equity and Compliance) <nhopkins@berry.edu>; Scott <scottlamb@berry.edu>; Corneal, David M (Legal Affairs) <dcorry@berry.edu>		RE: SECOND Draft (post Corry and Lamb) Multiple Plaintiff Title IX Lawsuit Response.mnt	Re: SECOND Draft (post Corry and Lamb) Multiple Plaintiff Title IX Lawsuit Response	Privileged - Product	Attorney Client Work Product	Email from Scott Lamb to in-house counsel, Shon Muldown, Scott Hicks, Jerry Freese, and Nathan Hopkins, containing response to draft public statement prepared by in-house counsel in response to pending litigation
U000178	U000178	7/20/2021	7/20/2021	Corry, David M (Legal Affairs) <dcorry@berry.edu>	Freese, Jerry <jfreese@berry.edu>; Hine, Mark <mhine@berry.edu>; Hinkley, Richard Dale (Police Department (LUPD)) <rhinkley@berry.edu>; Scott, Ronald Thomas <rscott@berry.edu>; Hopkins, Nathan Lawrence (Office of Equity and Compliance) <nhopkins@berry.edu>; Hine, Mark <mhine@berry.edu>; Freese, Jerry <jfreese@berry.edu>; Corneal, David M (Legal Affairs) <dcorry@berry.edu>; Foster, David (Human Resources) <dfoster@berry.edu>; Muldown, Shon Anthony <smuldown@berry.edu>		12 Laws Due Joint Title IX Claims mnt	12 Laws Due Joint Title IX Claims	Privileged - Product	Attorney Client Work Product	Email from in-house counsel to executive employees, containing in-house counsel's legal advice regarding pending litigation	
U000223	U000224	7/20/2021	7/20/2021	Freese, Jerry <jfreese@berry.edu>	Lamb, Scott <scottlamb@berry.edu>	Muldown, Shon Anthony <smuldown@berry.edu>; McBary, Ian Michael <imcBary@berry.edu>; Hopkins, Nathan Lawrence (Office of Equity and Compliance) <nhopkins@berry.edu>; Hitz, Rob (Finance Admin) <rhitz@berry.edu>; Kennedy, Ron (Recruitment and Retention) <rkennedy@berry.edu>; Corneal, David M (Legal Affairs) <dcorry@berry.edu>; Freese, Jerry <jfreese@berry.edu>		RE: SECOND Draft (post Corry and Lamb) Multiple Plaintiff Title IX Lawsuit Response.mnt	Re: SECOND Draft (post Corry and Lamb) Multiple Plaintiff Title IX Lawsuit Response	Privileged - Product	Attorney Client Work Product	Email from Jerry Freese to in-house counsel and Scott Lamb, containing edits to draft statement prepared by in-house counsel in response to pending litigation
U000225	U000226	7/20/2021	7/20/2021	Corry, David M (Legal Affairs) <dcorry@berry.edu>	Freese, Jerry <jfreese@berry.edu>; Lamb, Scott <scottlamb@berry.edu>	Muldown, Shon Anthony <smuldown@berry.edu>; McBary, Ian Michael <imcBary@berry.edu>; Hopkins, Nathan Lawrence (Office of Equity and Compliance) <nhopkins@berry.edu>; Hitz, Rob (Finance Admin) <rhitz@berry.edu>; Kennedy, Ron (Recruitment and Retention) <rkennedy@berry.edu>; Corneal, David M (Legal Affairs) <dcorry@berry.edu>; Freese, Jerry <jfreese@berry.edu>		RE: SECOND Draft (post Corry and Lamb) Multiple Plaintiff Title IX Lawsuit Response.mnt	Re: SECOND Draft (post Corry and Lamb) Multiple Plaintiff Title IX Lawsuit Response	Privileged - Product	Attorney Client Work Product	Email from in-house counsel to Jerry Freese and Scott Lamb, containing in-house counsel's legal advice regarding pending litigation
U000227	U000227	7/20/2021	7/20/2021	McBary, Ian Michael (Legal Affairs) <imcBary@berry.edu>	Lamb, Scott <scottlamb@berry.edu>	Freese, Jerry <jfreese@berry.edu>; Lamb, Scott <scottlamb@berry.edu>; Muldown, Shon Anthony <smuldown@berry.edu>; McBary, Ian Michael <imcBary@berry.edu>; Hopkins, Nathan Lawrence (Office of Equity and Compliance) <nhopkins@berry.edu>; Hitz, Rob (Finance Admin) <rhitz@berry.edu>; Kennedy, Ron (Recruitment and Retention) <rkennedy@berry.edu>; Corneal, David M (Legal Affairs) <dcorry@berry.edu>; Freese, Jerry <jfreese@berry.edu>		RE: First Draft Multiple Plaintiff Title IX Lawsuit Response.mnt	Re: First Draft Multiple Plaintiff Title IX Lawsuit Response	Privileged - Product	Attorney Client Work Product	Email from in-house counsel to in-house counsel, Shon Muldown, Scott Lamb, and Nathan Hopkins, containing in-house counsel's legal advice regarding response to pending litigation
U000228	U000228	7/20/2021	7/20/2021	Lamb, Scott <scottlamb@berry.edu>	Lamb, Scott <scottlamb@berry.edu>	Freese, Jerry <jfreese@berry.edu>; Lamb, Scott <scottlamb@berry.edu>; Muldown, Shon Anthony <smuldown@berry.edu>; McBary, Ian Michael <imcBary@berry.edu>; Hopkins, Nathan Lawrence (Office of Equity and Compliance) <nhopkins@berry.edu>; Hitz, Rob (Finance Admin) <rhitz@berry.edu>; Kennedy, Ron (Recruitment and Retention) <rkennedy@berry.edu>; Corneal, David M (Legal Affairs) <dcorry@berry.edu>; Freese, Jerry <jfreese@berry.edu>		RE: SECOND Draft (post Corry and Lamb) Multiple Plaintiff Title IX Lawsuit Response.mnt	Re: SECOND Draft (post Corry and Lamb) Multiple Plaintiff Title IX Lawsuit Response	Privileged - Product	Attorney Client Work Product	Email from Scott Lamb to in-house counsel, Jerry Freese, Shon Muldown, Nathan Hopkins, and Scott Hicks, containing request for legal advice regarding response to pending litigation
U000241	U000241	7/20/2021	7/20/2021	Lamb, Scott <scottlamb@berry.edu>	Lamb, Scott <scottlamb@berry.edu>	Freese, Jerry <jfreese@berry.edu>; Lamb, Scott <scottlamb@berry.edu>; Muldown, Shon Anthony <smuldown@berry.edu>; McBary, Ian Michael <imcBary@berry.edu>; Hopkins, Nathan Lawrence (Office of Equity and Compliance) <nhopkins@berry.edu>; Hitz, Rob (Finance Admin) <rhitz@berry.edu>; Kennedy, Ron (Recruitment and Retention) <rkennedy@berry.edu>; Corneal, David M (Legal Affairs) <dcorry@berry.edu>; Freese, Jerry <jfreese@berry.edu>		RE: THIRD (and hearing final) Draft (post Corry and Lamb and Lamb)	Re: THIRD (and hearing final) Draft (post Corry and Lamb and Lamb)	Privileged - Product	Attorney Client Work Product	Email from Scott Lamb to in-house counsel, Shon Muldown, and Nathan Hopkins, containing draft response prepared by in-house counsel in response to pending litigation
U000242	U000242					statement (post law) doc				Privileged - Product	Attorney Client Work Product	Draft statement prepared by in-house counsel in response to pending litigation

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Production Rate	Production Rate	Date Sent	Date	From	To	CC	BCC	File Name	Email Subject	Privilege	Privilege Type	Privilege Log - Description
LO00028	LO00029	7/22/2021	7/22/2021	Trinity, Marcus Allen (Police Department - LUPD) <omr@lucyberry.edu>	Corry, David M (Legal Affairs) <dcm@lucyberry.edu>	LAMB, Scott <dcm@lucyberry.edu>; Hinkley, Richard Dale (Police Department - LUPD) <richard.d.hinkley@lucyberry.edu>; Sloan, Ronald Thomas <rsloan@lucyberry.edu>; Hinkley, Laura (Human Resources) <lhinkley@lucyberry.edu>; Hinkley, Richard Dale (Police Department - LUPD) <richard.d.hinkley@lucyberry.edu>; McHenry, Ian Michael (Legal Affairs) <imhenry@lucyberry.edu>	RE: MEDIA REQUEST - Cynthia Beasley (WSET) - daily sister records, Sheriff Beasley, etc. .mit	RE: MEDIA REQUEST - Cynthia Beasley (WSET) - daily sister records, Sheriff Beasley, etc. .mit	Privileged - Enforcey	Attorney Client; Work Product	Email from Marcus Timley to in-house counsel, discussing in-house counsel's legal advice regarding response to journalist's questions related to pending litigation	
LO00029	LO00030	7/22/2021	7/22/2021	Corry, David M (Legal Affairs) <dcm@lucyberry.edu>	Trinity, Marcus Allen (Police Department - LUPD) <omr@lucyberry.edu>	LAMB, Scott <dcm@lucyberry.edu>; Hinkley, Richard Dale (Police Department - LUPD) <richard.d.hinkley@lucyberry.edu>; Sloan, Ronald Thomas <rsloan@lucyberry.edu>; Hinkley, Laura (Human Resources) <lhinkley@lucyberry.edu>; Hinkley, Richard Dale (Police Department - LUPD) <richard.d.hinkley@lucyberry.edu>; McHenry, Ian Michael (Legal Affairs) <imhenry@lucyberry.edu>	RE: MEDIA REQUEST - Cynthia Beasley (WSET) - daily sister records, Sheriff Beasley, etc. .mit	RE: MEDIA REQUEST - Cynthia Beasley (WSET) - daily sister records, Sheriff Beasley, etc. .mit	Privileged - Enforcey	Attorney Client; Work Product	Email from in-house counsel to Marcus Timley, containing in-house counsel's legal advice regarding response to journalist's questions related to pending litigation	
LO00030	LO00031	7/22/2021	7/22/2021	McHenry, Ian Michael (Legal Affairs) <imhenry@lucyberry.edu>	Corry, David M (Legal Affairs) <dcm@lucyberry.edu>; Trinity, Marcus Allen (Police Department - LUPD) <omr@lucyberry.edu>	LAMB, Scott <dcm@lucyberry.edu>; Hinkley, Richard Dale (Police Department - LUPD) <richard.d.hinkley@lucyberry.edu>; Sloan, Ronald Thomas <rsloan@lucyberry.edu>; Hinkley, Laura (Human Resources) <lhinkley@lucyberry.edu>; Hinkley, Richard Dale (Police Department - LUPD) <richard.d.hinkley@lucyberry.edu>; McHenry, Ian Michael (Legal Affairs) <imhenry@lucyberry.edu>	RE: MEDIA REQUEST - Cynthia Beasley (WSET) - daily sister records, Sheriff Beasley, etc. .mit	RE: MEDIA REQUEST - Cynthia Beasley (WSET) - daily sister records, Sheriff Beasley, etc. .mit	Privileged - Enforcey	Attorney Client; Work Product	Email from in-house counsel to Marcus Timley and in-house counsel, containing in-house counsel's legal advice regarding response to journalist's questions related to pending litigation	
LO00031	LO00032	7/22/2021	7/22/2021	McHenry, Ian Michael (Legal Affairs) <imhenry@lucyberry.edu>	Corry, David M (Legal Affairs) <dcm@lucyberry.edu>; Trinity, Marcus Allen (Police Department - LUPD) <omr@lucyberry.edu>	LAMB, Scott <dcm@lucyberry.edu>; Hinkley, Richard Dale (Police Department - LUPD) <richard.d.hinkley@lucyberry.edu>; Sloan, Ronald Thomas <rsloan@lucyberry.edu>; Hinkley, Laura (Human Resources) <lhinkley@lucyberry.edu>; Hinkley, Richard Dale (Police Department - LUPD) <richard.d.hinkley@lucyberry.edu>; McHenry, Ian Michael (Legal Affairs) <imhenry@lucyberry.edu>	RE: MEDIA REQUEST - Cynthia Beasley (WSET) - daily sister records, Sheriff Beasley, etc. .mit	RE: MEDIA REQUEST - Cynthia Beasley (WSET) - daily sister records, Sheriff Beasley, etc. .mit	Privileged - Enforcey	Attorney Client; Work Product	Email from in-house counsel to Marcus Timley and in-house counsel, containing in-house counsel's legal advice regarding response to journalist's questions related to pending litigation	
LO00032	LO00033	7/22/2021	7/22/2021	Trinity, Marcus Allen (Police Department - LUPD) <omr@lucyberry.edu>	LAMB, Scott <dcm@lucyberry.edu>	LAMB, Scott <dcm@lucyberry.edu>; Hinkley, Richard Dale (Police Department - LUPD) <richard.d.hinkley@lucyberry.edu>; Sloan, Ronald Thomas <rsloan@lucyberry.edu>; Hinkley, Laura (Human Resources) <lhinkley@lucyberry.edu>; Hinkley, Richard Dale (Police Department - LUPD) <richard.d.hinkley@lucyberry.edu>; McHenry, Ian Michael (Legal Affairs) <imhenry@lucyberry.edu>	RE: Media Request Summary .mit	RE: Media Request Summary .mit	Privileged - Enforcey	Attorney Client; Work Product	Email threat consisting of 1 email from Don Sloan to in-house counsel, containing summary of external counsel's legal advice regarding pending litigation involving Jerry Fawell Jr.	
LO00033	LO00034	7/26/2021	7/26/2021	David/A, Scott C <scottc@lucyberry.edu>	LAMB, Scott <dcm@lucyberry.edu>	Corry, David M (Legal Affairs) <dcm@lucyberry.edu>; Cunningham, Jaeha A <jacunningham@lucyberry.edu>; Sloan, Ronald Thomas <rsloan@lucyberry.edu>; Hinkley, Richard Dale (Police Department - LUPD) <richard.d.hinkley@lucyberry.edu>	RE: External RE: JF lawsuit .mit	RE: External RE: JF lawsuit .mit	Privileged - Enforcey	Attorney Client; Work Product	Email from in-house counsel to Scott Lamb, Rob Ritz, Jim Nichols, Cindy Glabe, Vickery Hinkley, and in-house counsel, discussing in-house counsel's legal advice regarding response to attorney issued in response to pending litigation	
LO00034	LO00035	8/2/2021	8/2/2021	Corry, David M (Legal Affairs) <dcm@lucyberry.edu>	LAMB, Scott <dcm@lucyberry.edu>; Hinkley, Richard Dale (Police Department - LUPD) <richard.d.hinkley@lucyberry.edu>; Sloan, Ronald Thomas <rsloan@lucyberry.edu>; Hinkley, Laura (Human Resources) <lhinkley@lucyberry.edu>; Hinkley, Richard Dale (Police Department - LUPD) <richard.d.hinkley@lucyberry.edu>; McHenry, Ian Michael (Legal Affairs) <imhenry@lucyberry.edu>	RE: MEDIA RELATED INFO: Advisory Notification from Charity Navigator .mit	RE: MEDIA RELATED INFO: Advisory Notification from Charity Navigator .mit	Privileged - Enforcey	Attorney Client; Work Product	Email from in-house counsel to Scott Lamb, Rob Ritz, Jim Nichols, Cindy Glabe, Vickery Hinkley, and in-house counsel, discussing in-house counsel's legal advice regarding response to attorney issued in response to pending litigation		
LO00035	LO00036	8/9/2021	8/9/2021	LAMB, Scott <dcm@lucyberry.edu>	LAMB, Scott <dcm@lucyberry.edu>	RE: MEDIA REQUEST: Sarah Joann Clarks .mit	RE: MEDIA REQUEST: Sarah Joann Clarks .mit	RE: MEDIA REQUEST: Sarah Joann Clarks .mit	Privileged - Enforcey	Attorney Client; Work Product	Email from Scott Lamb to Jerry Fawell, Mark Hinkley, Richard Hinkley, Ron Sloan, Nathanael Hinkley, and in-house counsel, discussing in-house counsel's legal advice regarding response to journalist's questions concerning pending litigation	
LO00036	LO00037	8/9/2021	8/9/2021	Sloan, Don T <don.t.sloan@lucyberry.edu>	Corry, David M (Legal Affairs) <dcm@lucyberry.edu>	Hinkley, Richard Dale (Police Department - LUPD) <richard.d.hinkley@lucyberry.edu>; McHenry, Ian Michael (Legal Affairs) <imhenry@lucyberry.edu>	RE: [External] FW: question from NFR reporter .mit	RE: [External] FW: question from NFR reporter .mit	Privileged - Enforcey	Attorney Client; Work Product	Email threat consisting of 1 email from Don Sloan to in-house counsel, containing request for in-house counsel to discuss with Don Sloan, containing in-house counsel's legal advice regarding response to journalist's questions concerning pending litigation; 3 email from Don Sloan to in-house counsel, containing in-house counsel's legal advice regarding response to journalist's questions concerning pending litigation	
LO00037	LO00038	8/9/2021	8/9/2021	Corry, David M (Legal Affairs) <dcm@lucyberry.edu>	LAMB, Scott <dcm@lucyberry.edu>	RE: [External] FW: question from NFR reporter .mit	RE: MEDIA REQUEST: Sarah Joann Clarks .mit	RE: MEDIA REQUEST: Sarah Joann Clarks .mit	Privileged - Enforcey	Attorney Client; Work Product	Email from in-house counsel to Scott Lamb, containing in-house counsel's legal advice regarding response to journalist's questions concerning pending litigation	
LO00038	LO00039	8/9/2021	8/9/2021	Hinkley, Mark <mark.hinkley@lucyberry.edu>	LAMB, Scott <dcm@lucyberry.edu>	RE: [External] FW: question from NFR reporter .mit	RE: MEDIA REQUEST: Sarah Joann Clarks .mit	RE: MEDIA REQUEST: Sarah Joann Clarks .mit	Privileged - Enforcey	Attorney Client; Work Product	Email from Mark Hinkley to Scott Lamb and in-house counsel, discussing in-house counsel's legal advice regarding response to journalist's questions concerning pending litigation	

Production Number Begin	Production Number End	Date Sent	Date Received	From	To	CC	File Name	Email Subject	Privilege Type	Privilege	Privilege Log Description
LU000368	LU000371	8/9/2021	8/9/2021	Corry, David M (Legal Affairs) <dmcory@liberty.edu>	Lamb, Scott <scottlamb@liberty.edu>	LU000371-8/21-2021 / LIBERTY PRIVILEGE LOG / DECEMBER 16, 2022 CC MC	RE MEDIA REQUEST Sarah McCammon (NPR) Jane Doe Joint Title 18 Claims.mht	RE MEDIA REQUEST Sarah McCammon (NPR) Jane Doe Joint Title 18 Joint Title 18 Claims	Attorney Client Work Product	Privileged - Entirety	Email from in-house counsel to Scott Lamb, containing in-house counsel's legal advice regarding EFRA and response to journalists' questions concerning pending litigation
LU000372	LU000375	8/9/2021	8/9/2021	McBary, Ian Michael (Legal Affairs) <imcbary@liberty.edu>	Lamb, Scott <scottlamb@liberty.edu>, Corry, David M (Legal Affairs) <dmcory@liberty.edu>	LU000372-8/21-2021 / LIBERTY PRIVILEGE LOG / DECEMBER 16, 2022 CC MC	RE MEDIA REQUEST Sarah McCammon (NPR) Jane Doe Joint Title 18 Claims.mht	RE MEDIA REQUEST Sarah McCammon (NPR) Jane Doe Joint Title 18 Joint Title 18 Claims	Attorney Client Work Product	Privileged - Entirety	Email from in-house counsel to Scott Lamb and in-house counsel, containing in-house counsel's legal advice regarding EFRA and response to journalists' questions concerning pending litigation
LU000376	LU000377						EFRA Handbook 2-3-23.pdf		Attorney Client Work Product	Privileged - Entirety	Memorandum drafted by in-house counsel regarding EFRA compliance
LU000382	LU000394	8/9/2021	8/9/2021	Steen, Ronald Thomas <rsteens@liberty.edu>	Lamb, Scott <scottlamb@liberty.edu>		RE MEDIA REQUEST Sarah McCammon (NPR) Jane Doe Joint Title 18 Claims.mht	RE MEDIA REQUEST Sarah McCammon (NPR) Jane Doe Joint Title 18 Joint Title 18 Claims	Attorney Client Work Product	Privileged - Entirety	Email from Ron Steen to Scott Lamb and in-house counsel, reflecting request for legal advice regarding response to journalists' questions concerning pending litigation
LU000395	LU000396	8/9/2021	8/9/2021	Corry, David M (Legal Affairs) <dmcory@liberty.edu>	Hopkins, Nathan Lawrence (Office of Equity and Compliance) <nhopkins@liberty.edu>		RE External Request for interview from ProPublica.mht	RE External Request for interview from ProPublica.mht	Attorney Client Work Product	Privileged - Entirety	Email from in-house counsel to Nathan Hopkins and Scott Lamb, containing in-house counsel's legal advice regarding EFRA and response to journalists' questions concerning pending litigation
LU000397	LU000399	8/9/2021	8/9/2021	McBary, Ian Michael (Legal Affairs) <imcbary@liberty.edu>	Corry, David M (Legal Affairs) <dmcory@liberty.edu>, Lamb, Scott <scottlamb@liberty.edu> <scottlamb@liberty.edu>		RE External Request for interview from ProPublica.mht	RE External Request for interview from ProPublica.mht	Attorney Client Work Product	Privileged - Entirety	Email thread consisting of 1 email from Nathan Hopkins to Scott Lamb and in-house counsel, reflecting request for in-house counsel's legal advice regarding response to journalists' questions concerning pending litigation; 2 email from in-house counsel to in-house counsel, reflecting request for in-house counsel's legal advice regarding response to journalists' questions concerning pending litigation; 3 email from in-house counsel to in-house counsel, reflecting request for in-house counsel's legal advice regarding EFRA and response to journalists' questions concerning pending litigation
LU000400	LU000401	8/11/2021	8/11/2021	McBary, Ian Michael (Legal Affairs) <imcbary@liberty.edu>	Hopkins, Nathan Lawrence (Office of Equity and Compliance) <nhopkins@liberty.edu>		RE External Request for interview from ProPublica.mht	RE External Request for interview from ProPublica.mht	Attorney Client Work Product	Privileged - Entirety	Email from in-house counsel to Scott Lamb, containing in-house counsel's legal advice regarding EFRA and response to journalists' questions concerning pending litigation
LU000402	LU000407						RE External Request for interview from ProPublica.mht	RE External Request for interview from ProPublica.mht	Attorney Client Work Product	Privileged - Entirety	Email from in-house counsel to Scott Lamb, containing in-house counsel's legal advice regarding EFRA and response to journalists' questions concerning pending litigation

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Production Number Bates Stamp	Production Number	Date Sent	Date Received	From	To	CC	FILE NAME	Email Subject	Privilege	Privilege Type	Privilege Log Description
LU000491	LU000508	7/20/2021	7/21/2021	Lamb, Scott <CCHXKXNLSAR@OCH-EXCHANGE (PROBCH23P9D1T2N4REC9FNTS)C=N- 9484660793471BFC5653C32A069- WSJAM81>	Corry, David M (Legal Affairs) <ccorrm@berry.edu>; Premo, Jerry <jpremo@berry.edu>	MCC	DRFT responses to Julie Roy (post Scott Lamb) docx	RE: DRFT responses to Julie Roy (post Scott Lamb) docx	Privileged - Entirety	Attorney Client	DRFT responses to journalist's questions concerning alleged Clay Act violations. Prepared by Scott Lamb to in-house counsel and Jerry Premo, discussing in-house counsel's legal advice regarding response to journalist's questions concerning alleged Clay Act violations
LU000509	LU000511	7/20/2021	7/21/2021	Lamb, Scott <CCHXKXNLSAR@OCH-EXCHANGE (PROBCH23P9D1T2N4REC9FNTS)C=N- 9484660793471BFC5653C32A069- WSJAM81>	Corry, David M (Legal Affairs) <ccorrm@berry.edu>		RE: DRFT responses to Julie Roy (post Scott Lamb) docx	RE: DRFT responses to Julie Roy (post Scott Lamb) docx	Privileged - Entirety	Attorney Client	Scott from Scott Lamb to in-house counsel, discussing in-house counsel's legal advice regarding response to journalist's questions concerning alleged Clay Act violations
LU000513	LU000515	7/20/2021	7/21/2021	Lamb, Scott <CCHXKXNLSAR@OCH-EXCHANGE (PROBCH23P9D1T2N4REC9FNTS)C=N- 9484660793471BFC5653C32A069- WSJAM81>	Corry, David M (Legal Affairs) <ccorrm@berry.edu>		RE: Public Relations/Media Relations Strategy.mht	RE: Public Relations/Media Relations Strategy.mht	Privileged - Entirety	Attorney Client; Work Product	Scott from Scott Lamb to in-house counsel, discussing in-house counsel's legal advice regarding response to journalist's questions concerning alleged Clay Act violations
LU000516	LU000517	7/20/2021	7/20/2021	Lamb, Scott <CCHXKXNLSAR@OCH-EXCHANGE (PROBCH23P9D1T2N4REC9FNTS)C=N- 9484660793471BFC5653C32A069- WSJAM81>	Lamb, Scott <ccorrm@berry.edu>		RE: SECOND Draft (post Corry and Lamb) Multiple Plaintiff Title IX Lawsuit Responses.mht	RE: SECOND Draft (post Corry and Lamb) Multiple Plaintiff Title IX Lawsuit Responses	Privileged - Entirety	Attorney Client; Work Product	Email from Scott Lamb to in-house counsel, Scott Mulrow, Nathan Hopkins, Scott Hicke, and Jerry Premo, containing response to draft statement prepared by in-house counsel in response to pending litigation
LU000518	LU000519	7/20/2021	7/20/2021	Lamb, Scott <CCHXKXNLSAR@OCH-EXCHANGE (PROBCH23P9D1T2N4REC9FNTS)C=N- 9484660793471BFC5653C32A069- WSJAM81>	Lamb, Scott <ccorrm@berry.edu>		RE: SECOND Draft (post Corry and Lamb) Multiple Plaintiff Title IX Lawsuit Responses.mht	RE: SECOND Draft (post Corry and Lamb) Multiple Plaintiff Title IX Lawsuit Responses	Privileged - Entirety	Attorney Client; Work Product	Email from Scott Lamb to in-house counsel, Scott Mulrow, Nathan Hopkins, Scott Hicke, and Jerry Premo, containing response to draft statement prepared by in-house counsel in response to pending litigation
LU000520	LU000522	7/20/2021	7/20/2021	Lamb, Scott <CCHXKXNLSAR@OCH-EXCHANGE (PROBCH23P9D1T2N4REC9FNTS)C=N- 9484660793471BFC5653C32A069- WSJAM81>	Lamb, Scott <ccorrm@berry.edu>		RE: SECOND Draft (post Corry and Lamb) Multiple Plaintiff Title IX Lawsuit Responses.mht	RE: SECOND Draft (post Corry and Lamb) Multiple Plaintiff Title IX Lawsuit Responses	Privileged - Entirety	Attorney Client; Work Product	Email from Scott Lamb to in-house counsel, Scott Mulrow, Nathan Hopkins, Scott Hicke, and Jerry Premo, containing response to draft statement prepared by in-house counsel in response to pending litigation and request for in-house counsel's legal advice on the same
LU000523	LU000525	7/20/2021	7/20/2021	Lamb, Scott <CCHXKXNLSAR@OCH-EXCHANGE (PROBCH23P9D1T2N4REC9FNTS)C=N- 9484660793471BFC5653C32A069- WSJAM81>	Lamb, Scott <ccorrm@berry.edu>		RE: THIRD (and rearing final) Draft (post Corry and Lamb and last.mht)	RE: THIRD (and rearing final) Draft (post Corry and Lamb and last.mht)	Privileged - Entirety	Attorney Client; Work Product	Email from Scott Lamb to in-house counsel, Scott Mulrow, Nathan Hopkins, Scott Hicke, and Jerry Premo, containing draft statement prepared by in-house counsel in response to pending litigation
LU000524	LU000526	7/20/2021	7/20/2021	Lamb, Scott <CCHXKXNLSAR@OCH-EXCHANGE (PROBCH23P9D1T2N4REC9FNTS)C=N- 9484660793471BFC5653C32A069- WSJAM81>	Corry, David M (Legal Affairs) <ccorrm@berry.edu>		statement (post last) docx	FINAL (pending any called in edits in the next 10 minutes)	Privileged - Entirety	Attorney Client; Work Product	Draft statement prepared by in-house counsel in response to pending litigation
LU000529	LU000530	7/20/2021	7/20/2021	Lamb, Scott <CCHXKXNLSAR@OCH-EXCHANGE (PROBCH23P9D1T2N4REC9FNTS)C=N- 9484660793471BFC5653C32A069- WSJAM81>	Corry, David M (Legal Affairs) <ccorrm@berry.edu>		statement (post last) docx	RE: THIRD (and rearing final) Draft (post Corry and Lamb and last.mht)	Privileged - Entirety	Attorney Client; Work Product	Draft statement prepared by in-house counsel in response to pending litigation
LU000531	LU000534	7/20/2021	7/20/2021	Lamb, Scott <CCHXKXNLSAR@OCH-EXCHANGE (PROBCH23P9D1T2N4REC9FNTS)C=N- 9484660793471BFC5653C32A069- WSJAM81>	Corry, David M (Legal Affairs) <ccorrm@berry.edu>		RE: FINAL (pending any called in edits in the next 10 minutes).mht	RE: FINAL (pending any called in edits in the next 10 minutes)	Privileged - Entirety	Attorney Client; Work Product	Email from Scott Lamb to in-house counsel, discussing in-house counsel's legal advice regarding draft statement in response to pending litigation
LU000535	LU000537	7/20/2021	7/20/2021	Lamb, Scott <CCHXKXNLSAR@OCH-EXCHANGE (PROBCH23P9D1T2N4REC9FNTS)C=N- 9484660793471BFC5653C32A069- WSJAM81>	Corry, David M (Legal Affairs) <ccorrm@berry.edu>		RE: 12 and Doc Joint Title IX Claims.mht	RE: 12 and Doc Joint Title IX Claims	Privileged - Entirety	Attorney Client; Work Product	Email from Scott Lamb to in-house counsel, containing response to internal statement prepared by in-house counsel in response to pending litigation

Production Dates Begin	Production Dates End	Date Sent	Date Received	From	To	CC	BCC	File Name	Email Subject	Privilege	Privilege Type	Privilege Log Description
LU00544		7/22/2021	7/22/2021	Lamb, Scott ADMINISTRATIVE GROUP (POLIOHFC23PDLT)@HRECIPENTS@N-948648607C34B71BFC5653C2A059-WSAANB1>	McBury, Ian Michael (Legal Affairs); <cmccurry@berly.edu>; Corry, David M (Legal Affairs); <dcorry@berly.edu>; Triney, Marcus Allen (Police Department (LU00)) <mtriney@berly.edu>	Hinkley, Richard Dale (Police Department (LU00)) <rhinkley@berly.edu>; Sloan, Ronald Thomas <rsloan@berly.edu>		RE MEDIA REQUEST: Cynthia Beatty (WSF) - daily, better records, Sheriff Dale, etc. jml	RE MEDIA REQUEST: Cynthia Beatty (WSF) - daily, better records, Sheriff Dale, etc.	Privileged - Entirety	Attorney Client; Work Product	Email from Scott Lamb to in-house counsel and Marcus Triney, reflecting request for in-house counsel's legal advice regarding document preservation in response to pending litigation
LU00545		8/9/2021	8/9/2021	Lamb, Scott ADMINISTRATIVE GROUP (POLIOHFC23PDLT)@HRECIPENTS@N-948648607C34B71BFC5653C2A059-WSAANB1>	Corry, David M (Legal Affairs); <dcorry@berly.edu>	Previo, Jerry; <jprevio@berly.edu>; Howe, Mark <mhowe@berly.edu>; Hinkley, Richard Dale <rhinkley@berly.edu>; Sloan, Ronald Thomas <rsloan@berly.edu>; Hopkins, Nathan Lawrence <nhopkins@berly.edu>; Wallace, Laura <lawallace@berly.edu>; Foster, Shane <sfoster@berly.edu>; Mulrow, Sharon Anthony <smulrow@berly.edu>; McBury, Ian Michael <imc@berly.edu>; <cmccurry@berly.edu>; Hicks, Scott <shicks@berly.edu>		RE MEDIA REQUEST: Sarah McCammon (NPR) - Jane Doe joint Title IX Claims.snh	RE MEDIA REQUEST: Sarah McCammon (NPR); Jane Doe joint Title IX Claims	Privileged - Entirety	Attorney Client; Work Product	Email from Scott Lamb to in-house counsel, discussing in-house counsel's legal advice regarding response to journalist's questions concerning pending litigation
LU00553		8/9/2021	8/9/2021	Lamb, Scott ADMINISTRATIVE GROUP (POLIOHFC23PDLT)@HRECIPENTS@N-948648607C34B71BFC5653C2A059-WSAANB1>	Corry, David M (Legal Affairs); <dcorry@berly.edu>	Previo, Jerry; <jprevio@berly.edu>; Howe, Mark <mhowe@berly.edu>; Hinkley, Richard Dale <rhinkley@berly.edu>; Sloan, Ronald Thomas <rsloan@berly.edu>; Hopkins, Nathan Lawrence <nhopkins@berly.edu>; Wallace, Laura <lawallace@berly.edu>; Foster, Shane <sfoster@berly.edu>; Mulrow, Sharon Anthony <smulrow@berly.edu>; McBury, Ian Michael <imc@berly.edu>; <cmccurry@berly.edu>; Hicks, Scott <shicks@berly.edu>		RE MEDIA REQUEST: Sarah McCammon (NPR) - Jane Doe joint Title IX Claims.snh	RE MEDIA REQUEST: Sarah McCammon (NPR); Jane Doe joint Title IX Claims	Privileged - Entirety	Attorney Client; Work Product	Email from Scott Lamb to in-house counsel, discussing in-house counsel's legal advice regarding response to journalist's questions concerning pending litigation
LU00557		8/9/2021	8/9/2021	Lamb, Scott ADMINISTRATIVE GROUP (POLIOHFC23PDLT)@HRECIPENTS@N-948648607C34B71BFC5653C2A059-WSAANB1>	McBury, Ian Michael (Legal Affairs); <cmccurry@berly.edu>	Corry, David M (Legal Affairs); <dcorry@berly.edu>; Howe, Mark <mhowe@berly.edu>; Hinkley, Richard Dale <rhinkley@berly.edu>; Sloan, Ronald Thomas <rsloan@berly.edu>; Hopkins, Nathan Lawrence <nhopkins@berly.edu>; Wallace, Laura <lawallace@berly.edu>; Foster, Shane <sfoster@berly.edu>; Mulrow, Sharon Anthony <smulrow@berly.edu>; McBury, Ian Michael <imc@berly.edu>; <cmccurry@berly.edu>; Hicks, Scott <shicks@berly.edu>		RE MEDIA REQUEST: Sarah McCammon (NPR) - Jane Doe joint Title IX Claims.snh	RE MEDIA REQUEST: Sarah McCammon (NPR); Jane Doe joint Title IX Claims	Privileged - Entirety	Attorney Client; Work Product	Email from Scott Lamb to in-house counsel, discussing in-house counsel's legal advice regarding response to journalist's questions concerning pending litigation
LU00563		8/9/2021	8/9/2021	Lamb, Scott ADMINISTRATIVE GROUP (POLIOHFC23PDLT)@HRECIPENTS@N-948648607C34B71BFC5653C2A059-WSAANB1>	Sloan, Ronald Thomas <rsloan@berly.edu>	Previo, Jerry; <jprevio@berly.edu>; Howe, Mark <mhowe@berly.edu>; Hinkley, Richard Dale <rhinkley@berly.edu>; Sloan, Ronald Thomas <rsloan@berly.edu>; Hopkins, Nathan Lawrence <nhopkins@berly.edu>; Wallace, Laura <lawallace@berly.edu>; Foster, Shane <sfoster@berly.edu>; Mulrow, Sharon Anthony <smulrow@berly.edu>; McBury, Ian Michael <imc@berly.edu>; <cmccurry@berly.edu>; Hicks, Scott <shicks@berly.edu>		RE MEDIA REQUEST: Sarah McCammon (NPR) - Jane Doe joint Title IX Claims.snh	RE MEDIA REQUEST: Sarah McCammon (NPR); Jane Doe joint Title IX Claims	Privileged - Entirety	Attorney Client; Work Product	Email from Scott Lamb to Ron Sloan, in-house counsel, Jerry Previo, Richard Hinkley, Nathan Hopkins, Laura Wallace, Shane Foster, Shan Mulrow, and Scott Hicks, reflecting in-house counsel's legal advice regarding response to journalist's questions concerning pending litigation
LU00568		8/17/2021	8/17/2021	Lamb, Scott ADMINISTRATIVE GROUP (POLIOHFC23PDLT)@HRECIPENTS@N-948648607C34B71BFC5653C2A059-WSAANB1>	Corry, David M (Legal Affairs); <dcorry@berly.edu>	McBury, Ian Michael <imc@berly.edu>; <cmccurry@berly.edu>; Howe, Mark <mhowe@berly.edu>; Hinkley, Richard Dale <rhinkley@berly.edu>; Sloan, Ronald Thomas <rsloan@berly.edu>		RE STATEMENT ON STUDENT ATHLETE PARTICIPATION PENDING FINAL OUTCOME OF TITLE IX PROCEEDINGS	RE STATEMENT ON STUDENT ATHLETE PARTICIPATION PENDING FINAL OUTCOME OF TITLE IX PROCEEDINGS	Privileged - Select	Attorney Client	Email from Scott Lamb to in-house counsel, discussing in-house counsel's legal advice regarding response to alleged student athlete Title IX violations
LU00570		8/16/2021	8/16/2021	Lamb, Scott ADMINISTRATIVE GROUP (POLIOHFC23PDLT)@HRECIPENTS@N-948648607C34B71BFC5653C2A059-WSAANB1>	McBury, Ian Michael (Legal Affairs); <cmccurry@berly.edu>	Corry, David M (Legal Affairs); <dcorry@berly.edu>; Howe, Mark <mhowe@berly.edu>; Hinkley, Richard Dale <rhinkley@berly.edu>; Sloan, Ronald Thomas <rsloan@berly.edu>		RE STATEMENT ON STUDENT ATHLETE PARTICIPATION PENDING FINAL OUTCOME OF TITLE IX PROCEEDINGS	RE STATEMENT ON STUDENT ATHLETE PARTICIPATION PENDING FINAL OUTCOME OF TITLE IX PROCEEDINGS	Privileged - Select	Attorney Client	Email from Scott Lamb to in-house counsel, discussing in-house counsel's legal advice regarding response to alleged student athlete Title IX violations
LU00573		8/16/2021	8/16/2021	Lamb, Scott ADMINISTRATIVE GROUP (POLIOHFC23PDLT)@HRECIPENTS@N-948648607C34B71BFC5653C2A059-WSAANB1>	McBury, Ian Michael (Legal Affairs); <cmccurry@berly.edu>	Corry, David M (Legal Affairs); <dcorry@berly.edu>; Howe, Mark <mhowe@berly.edu>; Hinkley, Richard Dale <rhinkley@berly.edu>; Sloan, Ronald Thomas <rsloan@berly.edu>		RE STATEMENT ON STUDENT ATHLETE PARTICIPATION PENDING FINAL OUTCOME OF TITLE IX PROCEEDINGS	RE STATEMENT ON STUDENT ATHLETE PARTICIPATION PENDING FINAL OUTCOME OF TITLE IX PROCEEDINGS	Privileged - Select	Attorney Client	Email from Scott Lamb to in-house counsel, discussing in-house counsel's legal advice regarding response to alleged student athlete Title IX violations
LU00576		8/24/2021	8/24/2021	Lamb, Scott ADMINISTRATIVE GROUP (POLIOHFC23PDLT)@HRECIPENTS@N-948648607C34B71BFC5653C2A059-WSAANB1>	McBury, Ian Michael <imc@berly.edu>	McBury, Ian Michael <imc@berly.edu>; <cmccurry@berly.edu>; Howe, Mark <mhowe@berly.edu>; Hinkley, Richard Dale <rhinkley@berly.edu>; Sloan, Ronald Thomas <rsloan@berly.edu>		RE STATEMENT ON STUDENT ATHLETE PARTICIPATION PENDING FINAL OUTCOME OF TITLE IX PROCEEDINGS	RE STATEMENT ON STUDENT ATHLETE PARTICIPATION PENDING FINAL OUTCOME OF TITLE IX PROCEEDINGS	Privileged - Select	Attorney Client	Email from in-house counsel to Scott Lamb and Ian McMurphy, containing in-house counsel's legal advice regarding each response to alleged student athlete Title IX violations

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LAMB v. BERRY / 2:21-cv-029 / LIBERTY PRIVILEGE LOG / DECEMBER 15, 2022											
Production Begin	Production End	Date Sent	Date Received	From	To	CC	File Name	Email Subject	Privilege	Privilege Type	Privilege Log Description
LU008647	LU008648	5/4/2020	5/4/2020	Lamb, Scott <dcorry@angelasbushexchange.com> ADMINISTRATIVE GROUP <admin@angelasbushexchange.com> 9484649075347718F5C653C3A06B- W5254845	Hopkins, Nathan Lawrence (Office of Equity and Compliance) <nathan.l.hopkins@berry.edu>	Corry, David M (Legal Affairs) <dcorry@berry.edu> McIntyre, Michael (Legal Affairs) <mcmintyre@berry.edu> Hawley, David (Legal Affairs) <dhawley@berry.edu> Dowell, Greg (Diversity, Equity and Inclusion) <gdowell@berry.edu> Stager, Stephanie (Office of Equity and Compliance) <stager@berry.edu>	RE: Title M FY	Attorney Client	Privileged - Substantive	Attorney Client	Email from in-house counsel to Scott Lamb, Scott Lamb, Nathan Hopkins, and Greg Dowell, containing in-house counsel's legal advice regarding ESSEA compliance.
LU008649	LU008650	5/15/2020	5/15/2020	Lamb, Scott <scott.lamb@equityandcompliance.com> Administrative Group <admin@berry.edu> McIntyre, Michael (Legal Affairs) <mcmintyre@berry.edu> Hawley, David (Legal Affairs) <dhawley@berry.edu> Dowell, Greg (Diversity, Equity and Inclusion) <gdowell@berry.edu> Stager, Stephanie (Office of Equity and Compliance) <stager@berry.edu>	Corry, David M (Legal Affairs) <dcorry@berry.edu>	McIntyre, Michael (Legal Affairs) <mcmintyre@berry.edu> Hawley, David (Legal Affairs) <dhawley@berry.edu> Dowell, Greg (Diversity, Equity and Inclusion) <gdowell@berry.edu> Stager, Stephanie (Office of Equity and Compliance) <stager@berry.edu>	RE: Granada Affair	Attorney Client Work Product	Privileged - Entirety	Email from Scott Lamb to in-house counsel, containing acts requested by in-house counsel in order to render legal advice regarding Jerry Prews Jr., made in response to pending litigation.	
LU008651	LU008652	5/4/2020	5/4/2020	Lamb, Scott <scott.lamb@equityandcompliance.com> Administrative Group <admin@berry.edu> McIntyre, Michael (Legal Affairs) <mcmintyre@berry.edu> Hawley, David (Legal Affairs) <dhawley@berry.edu> Dowell, Greg (Diversity, Equity and Inclusion) <gdowell@berry.edu> Stager, Stephanie (Office of Equity and Compliance) <stager@berry.edu>	Lamb, Scott <scott.lamb@berry.edu>	McIntyre, Michael (Legal Affairs) <mcmintyre@berry.edu> Hawley, David (Legal Affairs) <dhawley@berry.edu> Dowell, Greg (Diversity, Equity and Inclusion) <gdowell@berry.edu> Stager, Stephanie (Office of Equity and Compliance) <stager@berry.edu>	RE: [External] WSO Inquiry	Attorney Client	Privileged - Entirety	Email from in-house counsel to Scott Lamb, containing request for facts needed to render legal advice regarding response to journalist's questions concerning Jerry Prews Jr., made in-house counsel's legal advice regarding response to journalist's questions concerning Jerry Prews Jr., prepared in-house counsel's legal advice regarding response to journalist's questions concerning Jerry Prews Jr., prepared in-house counsel's legal advice regarding response to journalist's questions concerning Jerry Prews Jr., prepared in-house counsel's legal advice regarding response to journalist's questions concerning Jerry Prews Jr., prepared in-house counsel's legal advice regarding response to journalist's questions concerning Jerry Prews Jr., prepared in-house counsel's legal advice regarding response to journalist's questions concerning Jerry Prews Jr., prepared in-house counsel's legal advice regarding response to journalist's questions concerning Jerry Prews Jr., prepared in-house counsel's legal advice regarding response to journalist's questions concerning Jerry Prews Jr., prepared in-house counsel's legal advice regarding response to journalist's questions concerning Jerry Prews Jr., prepared in-house counsel's legal advice regarding response to journalist's questions 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